



**US EPA, Office of Enforcement and Compliance Assurance, Office of Compliance, Enforcement Planning, Targeting & Data Division (EPTDD)**

# **Closeness of Fit Analysis (COFA) of AFS to the Integrated Compliance Information System (ICIS) and the Introduction of AFS Business Rules**



# Background:

**The Needs Analysis completed in December 2002 provided EPA with a definitive statement of EPA/State information requirements for the National air compliance/enforcement program.**

**To complete the Needs Analysis report, a workgroup was formed to confirm and prioritize identified needs.**



## **Needs Analysis Workgroup Members:**

**John Downs, OKDEQ**

**David Finlayson, NYDEC**

**Christine Monk, ALDEM**

**Alice Nelson, VADEQ**

**Jim Pennington, FLDEP**

**Keith Duncan, STAPPA**

**Mamie Miller, EPA HQ**

**Rich Biondi, EPA HQ**

**Mark Antell, EPA HQ**

**David Sprague, EPA HQ**

**Ron Rutherford, EPA R8**

**Burnie Turlinski, EPA  
R3**

**Duane James, EPA R9**





**The Needs Analysis identified 96 high priority technical and program requirements.**

**The Workgroup also identified some action items:**

- **MDR Statement to Users: NO NEW DATA REQ**
- **Data Ownership: Everyone's Responsibility**
- **Action Code Workgroup: Standardize action reporting.**
- **OECA Evaluation of the need for Unit/Process information.**
- **Coordination with OAQPS for access to permit data.**
- **Compliance Status: Reevaluate and define.**
- **Compare AFS to ICIS.**



# The COFA

**The Closeness of Fit Analysis (COFA) shall provide business rules, comparison reports, information and analyses that will be used to make a decision to integrate AFS into ICIS, or to pursue an alternative means to modernize AFS.**



# Tasks for the COFA:

- 1. Compilation of Current AFS Business Rules**
- 2. Development of Baseline Evaluation Criteria**
- 3. Comparison and Analysis of AFS/ICIS Data Fields**
- 4. Comparison and Analysis of AFS/ICIS Data Reporting Procedures**
- 5. Comparison and Analysis of AFS/ICIS Functionality and Features**
- 6. Final Report.**



## **Task 1: Compilation of Current Business Rules**

**Draft Business Rules have been compiled for:**

- AFS Structure: Plant General, Plant CMS, Plant HPV, Plant Air Program and Pollutant, Plant Actions, Plant History**
- Use of National Action Types**
- Penalty Policy**
- Compliance Status Alternatives for the Compliance Workgroup review. (Chair: Ahmed Amanullah, EPA R4)**

**These documents will be provided at the AFS 2003 Workshop for review/comment by the AFS User Community.**



# User Review of Draft Business Rules:

- 1. Distribution of Draft Business Rules  
Comment Period Begins-July 2003  
Comment Period Ends--September 2003**
- 2. Loading Draft Business Rules on EPA Websites-  
July 2003**
- 3. Conference Calls with each Region-August-  
September 2003**
- 4. Finalize AFS Business Rules-October 2003**



# Comment Period

## Procedures:

- 1. Any user may comment on the draft Business Rules.**
- 2. Comments should be forwarded to the AFS Regional Compliance Manager to be queued for discussion.**
- 3. After all comments and discussions are held, a Final Draft will be presented to the AFS Change Configuration Board for final approval.**

**In the meantime, the COFA proceeds with analysis using draft business rules.**



## **COFA Schedule:**

**The COFA is scheduled  
for completion in  
October 2003.**